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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SAINT PAULUS LUTHERAN CHURCH and
HEDDI N. CUNDLE, individually and on
behalf of themselves and all others similarly
situated,

Plaintiffs,

vs.

ZOOM VIDEO COMMUNICATIONS, INC.,

Defendant.

Case No. _____

Class Action

Declaration of Heddi N. Cundle

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1 I, Heddi N. Cundle, declare as follows:

2 1. I am one of the plaintiffs in the above-captioned action, which asserts a claim
3 against Zoom Video Communications, Inc. ("Zoom") under the California Consumers Legal
4 Remedies Act ("CLRA"), CAL. CIV. CODE §§ 1750 *et seq.* In compliance with the CLRA, CAL. CIV.
5 CODE § 1780(d), I make this declaration based on my personal knowledge and my counsel's
6 investigation.

7 2. Venue in this District, which presides over the County of Santa Clara, is proper
8 because, as alleged in the complaint and based on my counsel's investigation:

- 9
- 10 • Zoom maintains its principal place of business in San Jose, within the
County of Santa Clara;
 - 11 • Zoom regularly transacts business in the County of Santa Clara;
 - 12 • many of the events and transactions giving rise to this action,
13 including the CLRA claim, occurred in the County of Santa Clara; and
 - 14 • upon information and belief, some Zoom users who are members of
15 the class reside in the County of Santa Clara.

16 I declare under penalty of perjury that the foregoing is true and correct. Executed on
17 May 12, 2020, in San Francisco, California.

18 

19 _____
Heddi N. Cundle